

EXHIBIT 2

From: [Haigney Long, Julia \(x2878\)](#)
To: [Elizabeth Snow](#); [David Elsberg](#); [Andrew Dunlap](#); [Wohlforth, E. Evans](#); [Meredith Nelson](#)
Cc: [Mangi, Adeel A. \(x2563\)](#); [Sandick, Harry \(x2723\)](#); [LoBiondo, George \(x2008\)](#); [Arrow, Sara \(x2031\)](#); [Shane, Beth \(x2659\)](#); [Brisson, Katherine \(x2552\)](#); ~jgreenbaum@sillscummis.com; ~klieb@sillscummis.com
Subject: RE: JHCS v. SaveOnSP (Case No. 2:22-cv-02632-ES-CLW)
Date: Thursday, June 22, 2023 11:20:59 PM
Attachments: [2023.06.XX SaveOn -- Joint Letter re non-JJHCS Custodians -- JJHCS position.DOCX](#)

Counsel:

Attached please find our edits to the proposed joint letter addressing SaveOnSP's request for non-JJHCS productions. Consistent with our approach to the joint letters in the past, if you make any changes to the version of the letter that we attach here, we reserve our right to edit our section of the letter before we authorize you to file.

JJHCS objects to SaveOnSP's proposed supplemental submission on RFP Nos. 61 and 62. The parties already submitted, and the Court already reviewed, a joint letter fully setting forth each party's positions and cited authorities on this dispute. See Dkt. No. 110. That is the only submission permitted under Local Rule 7; indeed, the Rule specifically precludes "further letter submissions" absent "leave of Court." If SaveOnSP insists on filing its proposed letter brief, JJHCS will move to strike that submission consistent with the Local Rules.

Best,
Julia

Julia Haigney Long
She | Her | Hers
Associate

Patterson Belknap Webb & Tyler LLP
1133 Avenue of the Americas
New York, NY 10036

T 212.336.2878

jhaigneylong@pbwt.com

From: Elizabeth Snow <esnow@selendygay.com>
Sent: Monday, June 19, 2023 9:03 PM
To: Mangi, Adeel A. (x2563) <aamangi@pbwt.com>; Sandick, Harry (x2723) <hsandick@pbwt.com>; LoBiondo, George (x2008) <globiondo@pbwt.com>; Shane, Beth (x2659) <eshane@pbwt.com>; Haigney Long, Julia (x2878) <jhaigneylong@pbwt.com>; Brisson, Katherine (x2552) <kbrisson@pbwt.com>; ~jgreenbaum@sillscummis.com <jgreenbaum@sillscummis.com>; Arrow, Sara (x2031) <sarrow@pbwt.com>; ~klieb@sillscummis.com <klieb@sillscummis.com>
Cc: ~delsberg@selendygay.com <delsberg@selendygay.com>; Andrew Dunlap <adunlap@selendygay.com>; Wohlforth, E. Evans <EWohlforth@rc.com>; Meredith Nelson <mnelson@selendygay.com>
Subject: JHCS v. SaveOnSP (Case No. 2:22-cv-02632-ES-CLW)

Caution: External Email!

Counsel,

Please find attached SaveOnSP's portion of two draft joint letters which SaveOnSP intends to file in advance of the June 27, 2023 conference. We ask that you please provide your portions by end of day Thursday, June 22, 2023.

Best,

Elizabeth

Elizabeth Snow

Associate [\[Email\]](#)

Selendy Gay Elsberg PLLC [\[Web\]](#)

Pronouns: she, her, hers

+1 212.390.9330 [O]

+1 540.409.7257 [M]

Privileged/Confidential Information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Please advise immediately if you or your employer do not consent to receiving email messages of this kind.
